

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

IN RE:)	
)	
CUMMINGS MANOOKIAN, PLLC,)	Case No. 3:19-bk-07235
Debtor.)	Chapter 7
)	Judge Walker
JEANNE ANN BURTON, TRUSTEE,)	
Plaintiff,)	
)	
v.)	
)	
HAGH LAW, PLLC; AFSOON)	
HAGH; MANOOKIAN, PLLC; and)	
FIRST-CITIZENS BANK & TRUST)	
COMPANY,)	
Defendants.)	
)	Adv. Proc. No. 3:20-ap-90002

**TRUSTEE’S REPLY TO MANOOKIAN PLLC’S RESPONSE TO PLAINTIFF’S
MOTION TO COMPEL DISCOVERY RESPONSES FROM MANOOKIAN PLLC**

Pursuant to the Court’s pretrial order in this matter, the Trustee submits this reply to Manookian PLLC’s Response to Plaintiff’s Motion to Compel Discovery Responses from Manookian PLLC (Doc. 271) (the “Response”).

The Renewed Motion to Compel Discovery Responses from Manookian, PLLC (Doc. 265) (the “Motion”) is the renewal of a prior motion to compel (*see* Doc. 95). Manookian PLLC continues to answer a question it was not asked (that is, whether Manookian PLLC has a claim against the estate) rather than the question that it has been repeatedly asked (whether Manookian PLLC claims any entitlement to fees from the *Fitzgerald* or *Shoemaker* cases, regardless of who is in possession of those fees). The Trustee needs an answer to this question in order to determine which parties claim an

interest in what fees, and the asserted basis for such interest. The Trustee believes that the question is a simple one that requires a simple response.

Finally, to address an issue in the Response, the Trustee's Motion complies with Bankruptcy Rule 7037 because this is a renewed motion; the prior motion to compel attached the interrogatories and responses. As stated in the Motion, the Trustee has received no further clarification of Manookian PLLC's response to Interrogatory 5.

Wherefore, the Trustee requests that the Court compel Manookian Law PLLC to fully respond to Interrogatory 5, and that it grant such other and further relief to which the Trustee might be entitled.

Dated: July 10, 2025

Respectfully Submitted,

/s/ Phillip G. Young, Jr.

Phillip G. Young, Jr.

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Special Counsel to Trustee

Certificate of Service

The undersigned hereby certifies that a true and exact copy of the foregoing has been served via electronic notice/ECF and/or United States Mail, first class, postage prepaid, to the following persons:

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This 10th day of July, 2025.

/s/ Phillip G. Young, Jr.

Phillip G. Young, Jr.